

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

Plaintiff,

-against-

Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); DirecTV, LLC; HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

Defendants.

Civil Action No. 2:13-cv-01112-JRG

JURY TRIAL DEMANDED

ContentGuard Holdings, Inc.,

Plaintiff,

-against-

Google, Inc.

Defendant.

Civil Action No. 2:14-cv-00061-JRG

JURY TRIAL DEMANDED

**JOINT NOTICE REGARDING MARKMAN HEARING**

Pursuant to the Court's Docket Control Orders, the parties respectfully request that the Court set aside a total of 3.5 hours for the February 6, 2015, claim construction hearings in the above-captioned cases. The parties respectfully request that (i) 3 hours, to be divided evenly between ContentGuard and the Defendants group, be set aside for claim construction argument; and (ii) 30 minutes, to be divided evenly between ContentGuard and Defendant Amazon.com,

Inc., be set aside for argument on Amazon.com, Inc.'s Motion to Dismiss the Second Amended Complaint (*Amazon* Dkt. 298).

Given the large number of disputed claim terms, the parties respectfully submit that oral argument should be focused on the following 12 terms, in the order presented below:

**A. Terms and terms that appear in both the Stefik patents ('859, '072, '576, '956, '007, and '160) and the Chen/Nguyen patents ('280 and '053)**

1. Repository/Trusted
2. Identification certificate
3. Usage rights
4. Manner of use
5. Digital document/Digital work/Digital content
6. Document platform
7. Render(ing/ed/able)
8. Distributed repository
9. Having a grammar

**B. Terms that appear only in the Chen/Nguyen patents ('280 and '053)**

10. Meta-right
11. State variable

**C. Term that appears only in the Dunkeld patent ('556)**

12. Detect(ing)

The parties stand ready to address terms that do not appear on the above list, should the Court be interested in hearing argument.

DATED: January 23, 2015

Respectfully submitted,

/s/ Sam Baxter

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on January 23, 2015.

/s/ Sam Baxter  
Sam Baxter